UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)	
V.)	DOCKET NO. 19-CR-251-LM
)	
JOHNATHON IRISH)	
)	

DEFENDANT'S REQUEST FOR SUPPLEMENTAL JURY INSTRUCTION

Defendant Johnathon Irish hereby requests that, in the Court's instruction on the definition of a firearm, the Court add the following:

The frame or receiver of a firearm is defined as: That part of a firearm which provides housing for the hammer, bolt or breechblock, and firing mechanism, and which is usually threaded at its forward portion to receive the barrel.

See 27 C.F.R. 478.11.

Defendant Johnathon Irish By his Attorney,

/s/ Benjamin L. Falkner

Benjamin L. Falkner (NH Bar No. 17686) KRASNOO, KLEHM & FALKNER LLP 28 Andover Street, Suite 240 Andover, MA 01810 (978) 475-9955 (telephone) (978) 474-9005 (facsimile) bfalkner@kkf-attorneys.com

Dated: February 6, 2020

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the within document upon the attorney of record for the Government via the Court's ecf system on February 6, 2020.

/s/ Benjamin L. Falkner Benjamin L. Falkner